

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David Eiseman (Bar No. 114758)
davideiseman@quinnemanuel.com
4 Sam Stake (Bar No. 257916)
samstake@quinnemanuel.com
5 50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
6 Facsimile: (415) 875-6700

7 Lance Yang (Bar No. 260705)
lanceyang@quinnemanuel.com
8 865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
9 Telephone: (213) 443 3000
Facsimile: (213) 443 3100

10 *Attorneys for Plaintiff Keyssa, Inc.*

11 KEKER, VAN NEST & PETERS LLP
Robert A. Van Nest (Bar No. 84065)
rvannest@keker.com
12 Leo L. Lam (Bar No. 181861)
llam@keker.com
Daniel Purcell (Bar No. 191424)
dpurcell@keker.com
Matthew M. Werdegar (Bar No. 200470)
mwerdegar@keker.com
13 Ryan K. Wong (Bar No. 267189)
rwong@keker.com
Christina Lee (Bar No. 314339)
clee@keker.com
633 Battery Street
14 San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

15 *Attorneys for Defendant
Essential Products, Inc.*

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 KEYSSA, INC.,

Plaintiff,

v.

ESSENTIAL PRODUCTS, INC.,

Defendant.

CASE NO. 4:17-cv-05908-HSG

**JOINT [PROPOSED] STIPULATED
ORDER REGARDING PRODUCTION
OF ELECTRONICALLY STORED
INFORMATION AND OTHER
DOCUMENTS**

IT IS HEREBY STIPULATED by and between the undersigned counsel for all parties:

I. GENERAL PROVISIONS

A. Absent special circumstances, the parties will prepare their production documents in accordance with the agreed-upon specifications set forth below. These specifications apply to documents or electronically stored information ("ESI"), which are to be produced in this litigation. These specifications shall not apply with respect to any documents that have already been produced by the parties.

1 **B.** Nothing in this order or any other document relating to discovery in this matter shall
2 be construed or interpreted as precluding a producing party from performing a responsiveness review
3 to determine if documents captured by search terms are in fact relevant to this litigation or responsive
4 to the requesting party's document requests. Further, nothing in this order or any other document
5 relating to discovery in this matter shall be construed or interpreted as requiring the production of all
6 documents captured by any search term if that document is, in good faith and consistent with the
7 California Rules of Professional Conduct, deemed by the producing party to be not relevant to this
8 litigation or not responsive to the requesting party's requests for production.

9 **II. PRODUCTION OF HARD-COPY DOCUMENTS**

10 **A. Form of Production.** All hard copy documents shall be produced as single-page
11 TIFF images with accompanying document-level OCR and Concordance and Opticon load files with
12 the following metadata fields: BegBates, EndBates, Page Count, and Custodian (as referenced in
13 Appendix A).

14 **B. Database Load Files/Cross-Reference Files.** Accompanying each production
15 should be a metadata file (DAT file) using standard Concordance delimiters or caret-pipe (^|¹)
16 delimiters.¹ Each production should also include an image load file in Opticon format (OPT). The
17 metadata file and image load file (*i.e.*, DAT and OPT files) should be provided in a self-identified
18 “Data” folder.

19 **C. Coding Fields.** Absent special circumstances, documents should be produced with
20 at least the following searchable information where applicable in accompanying delimited data files:
21 BegBates, EndBates, BegBatesAttach, EndBatesAttach, Page Count, Custodian, and ProdVolume
22 (as referenced in Appendix A). Custodians should be identified using the convention “last name_first
23 name” or “Last name, First name” where applicable. Entity/departmental custodians should be

25 ¹ Samples:

Concordance:

26 þBEGNUMþENDNUMþPAGESþDATEþAUTHORþRECIPIENTþCCþTITLEþDOCTYPEþ
þPOLGP000001þPOLGP000005þ5þ5_05/20/2000_PSmith, JamesþPolk, FredþþþHappy BirthdayþEMAILþ

Caret-Pipe:

27 ^BEGNUM|^ENDNUM|^PAGES|^DATE|^AUTHOR|^RECIPIENT|^CC|^TITLE|^DOCTYPE^
^POLGP000001|^POLGP000005|^5|^05/20/2000|^Smith, James|^Polk, Fred|^|^Happy Birthday|^EMAIL^

1 identified with a description of the entity or department. A producing party shall use a uniform
2 description of a particular custodian across productions. All agreed-upon custodians who were in
3 possession of a de-duplicated Document shall be identified in the CUSTODIANOTHER metadata
4 field to the extent reasonably possible.

5 **D. Bates Numbering.** Each document should be assigned a Bates number that: (1) is
6 unique across the entire document production, (2) maintains a constant length across the entire
7 production (*i.e.*, padded to the same number of characters), (3) contains no special characters or
8 embedded spaces, and (4) is sequential within a given document. If a Bates number or set of Bates
9 numbers is skipped in a production, the producing party will so note in a cover letter or production
10 log accompanying the production. Parties will make reasonable efforts to avoid obscuring any part
11 of the underlying image with the Bates number.

12 **E. Parent-Child Relationships.** Parent-child relationships (*i.e.*, the association
13 between an attachment and its parent document) must be preserved if reasonably possible (and to the
14 extent the parent-child relationship is reasonably apparent).

15 **F. Unitizing of Documents.** Absent special circumstances, when scanning paper
16 documents, the parties must, to the extent feasible, take reasonable steps to prevent distinct
17 documents from being merged into a single record, and to ensure that single documents are not be
18 split into multiple records (*i.e.*, paper documents should be logically unitized). In addition, scanned
19 paper documents must be produced as they existed in the normal course of business with information
20 that identifies the folder (or container) structure, to the extent such structure exists and to the extent
21 reasonably possible.

22 **G. Color.** Documents containing color need not be produced in color in the first
23 instance. If good cause exists for the receiving party to request production of certain documents in
24 color, the receiving party may request production of such documents in color. The producing party
25 shall not unreasonably deny such requests.

26
27
28

1 **III. PRODUCTION OF ELECTRONICALLY STORED INFORMATION (“ESI”)**

2 **A. TIFFs.** Documents should be produced in the form of single-page, Group IV TIFFs
3 with a minimum of 300 dpi. Each TIFF image should be named in accordance with the Bates number
4 appearing on the first page of the image. Original document orientation should be maintained (*i.e.*,
5 portrait to portrait and landscape to landscape). TIFF image files should be provided in a self-
6 identified “Images” folder.

7 However, no party shall be required to reformat documents or data that were previously
8 produced in other litigations, or in response to governmental or regulatory inquiries or investigations
9 before producing such materials in this action, or acquired as a complete set from a third-party. All
10 documents or data produced in the same format as they were produced or collected in such other
11 matters are deemed to be in compliance with this Stipulation when produced in this matter,
12 notwithstanding other provisions in this Stipulation. If the receiving party has a question, issue, or
13 concern about the form of production of previously produced documents, the parties agree to meet
14 and confer regarding the form of production.

15 **B. E-mail.** A requesting party shall limit its e-mail production requests to a total of eight
16 custodians per producing party for all such requests. The parties may jointly agree to modify this
17 limit without the Court’s leave. The parties shall meet and confer as soon as possible to identify the
18 custodians who are most likely to have responsive or relevant emails.

19 Each requesting party shall limit its e-mail production requests to a total of ten search terms
20 per custodian per party. The parties may jointly agree to modify this limit without the Court’s leave.
21 The search terms shall be narrowly tailored to particular issues. Indiscriminate terms, such as the
22 producing company’s name or its product name, are inappropriate unless combined with narrowing
23 search criteria that sufficiently reduce the risk of overproduction. A conjunctive combination of
24 multiple words or phrases (e.g., “computer” and “system”) narrows the search and shall count as a
25 single search term. A disjunctive combination of multiple words or phrases (e.g., “computer” or
26 “system”) broadens the search, and thus each word or phrase shall count as a separate search term
27 unless they are variants of the same word. A disjunctive string of patent numbers only counts as 1

1 term. Use of narrowing search criteria (e.g., “and,” “but not,” “w/x”) is encouraged to limit the
2 production and shall be considered when determining whether to shift costs for disproportionate
3 discovery.

4 Within fourteen days of receiving from Plaintiff Keyssa, Inc. a disclosure of its asserted trade
5 secrets pursuant to California Civil Procedure Code Section 2019.210, Defendant Essential Products,
6 Inc. will produce a list of internal or code terms for its products and services that are accused of
7 practicing the alleged trade secrets asserted in this action to the extent such internal or code terms
8 exist, and Plaintiff Keyssa, Inc. will produce a list of internal or code terms for its products and
9 services that allegedly practice the asserted trade secrets to the extent such internal or code terms
10 exist. Seven days after this disclosure of lists of internal or code terms, the parties shall propose and
11 exchange a list of custodians in compliance with the numerical limits set forth above. Seven days
12 after this disclosure of lists of custodians, the parties shall complete any meet and confer efforts
13 regarding the list of custodians previously exchanged. Fourteen days after finalizing the lists of
14 custodians, each party may provide a list of search terms in compliance with the numerical limits set
15 forth above for the other party to use in searching for emails. No later than fourteen days after
16 receiving the list of search terms, the other party shall provide a hit count identifying the number of
17 documents (including full document families) each search term identified during the search. The
18 parties agree that a hit count for a single search term that exceeds 12,500 hits for a single custodian
19 is presumptively unreasonable. The parties also agree that a hit count exceeding 100,000 hits for the
20 total review population of a single custodian is presumptively unreasonable. The parties shall meet
21 and confer in good faith to modify any search terms yielding presumptively unreasonable hit counts
22 on a custodian-by-custodian and search term-by-search term basis to reduce all hit counts below the
23 above identified hit thresholds. The requesting party may then provide a modified list of search
24 terms (but may not change the identified custodians), and the other party shall provide a hit count
25 identifying the number of documents each modified search term identified during the search within
26 three business days after receiving the modified list of search terms. After disputes regarding the
27 reasonableness of search terms for a given custodian has been resolved, the producing party shall

28

1 produce the identified emails for that custodian in a reasonably diligent manner. The parties agree
2 to meet and confer in good faith to prioritize the production of emails for specific custodians so that
3 emails are produced reasonably in advance of their depositions.

4 Nothing in this Order or the parties' agreement to limit email using the foregoing search
5 parameters shall relieve the parties of any obligations they may have to produce specific items of
6 responsive ESI that they know about but that do not fall within the parties' agreed-upon search
7 parameters. To the extent a party is aware or made aware of substantial amounts of responsive ESI
8 that has not fallen within the parties' agreed-upon search parameters, it agrees to meet and confer
9 with the requesting party to modify the parties' agreed-upon search parameters in order to encompass
10 such ESI. In addition, nothing in this Order shall prevent Defendant Essential Products, Inc. from
11 filing a motion challenging the sufficiency of and/or to strike Keyssa, Inc.'s disclosures under
12 California Civil Procedure Code Section 2019.210, and from seeking appropriate relief (including
13 from the schedule set forth herein) from the Court.

14 **C. System Files.** Common system and program files as defined by the NIST library
15 (which is commonly used by e-discovery vendors to exclude system and program files from
16 document review and production) need not be processed, reviewed, or produced.

17 **D. De-Duplication.** A party is required to produce only a single copy of a responsive
18 document, and a producing party shall de-duplicate responsive ESI across custodians by the use of
19 MD5 or SHA-1 hash values at the parent level. However, hard-copy documents shall not be
20 eliminated as duplicates of responsive ESI. All agreed-upon custodians who were in possession of
21 a de-duplicated Document shall be identified in the CUSTODIANOTHER metadata field to the
22 extent reasonably possible. Custodians should be identified using the convention "last name_first
23 name" or "Last name, First name" where applicable. Entity/departmental custodians should be
24 identified with a description of the entity or department. A producing party shall use a uniform
25 description of a particular custodian across productions. If, during the course of its review, the
26 producing party identifies additional duplicate documents, the parties reserve their rights to use a
27
28

1 custom de-duplication protocol but must disclose any such protocol to the receiving party prior to
2 implementing it.

3 **E. Parent-Child Relationships.** Parent-child relationships (*i.e.*, the association
4 between an attachment and its parent document) must be preserved if reasonably possible (and to the
5 extent the parent-child relationship is reasonably apparent). For example, electronic documents
6 attached to an email are to be produced contemporaneously and sequentially immediately after the
7 parent document. Similarly, if a party produces a document with attachments, appendices or indices,
8 those documents should be produced behind the document in the order in which they were attached.

9 **F. Metadata Fields and Processing.** To the extent reasonably available and accessible,
10 each of the metadata and coding fields set forth in Appendix A that can be extracted from a document
11 shall be produced for that document. The parties are not obligated to populate manually any of the
12 fields in Appendix A if such fields cannot be extracted from a document, with the exception of the
13 following: (1) BegProd, (2) EndProd, (3) BegAttach, (4) EndAttach, (5) Custodian, (6)
14 Confidentiality, (7) ProdVolume. ESI items shall be processed in a manner that preserves the source
15 native file and metadata without modification, including time, date, and time-zone metadata. ESI
16 items shall be processed in a manner that maintains and displays hidden columns or rows, hidden
17 text or worksheets, speaker notes, tracked changes and comments.

18 **G. Extracted Text Files.** For each document, an extracted text file should be provided
19 along with its corresponding TIFF image file(s) and metadata. The file name of each extracted text
20 file should be identical to that of the first image page of its corresponding document, followed by
21 .txt. File names should not contain any special characters or embedded spaces. The text of native
22 files should be extracted directly from the native file. However, if a document has been redacted,
23 OCR of the redacted document will suffice in lieu of extracted text.

24 **H. Database Load Files/Cross-Reference Files.** Accompanying each production
25 should be a metadata file (DAT file) using standard Concordance delimiters or caret-pipe (^|[^])
26 delimiters.² Each production should also include an image load file in Opticon format (OPT). The

28 ² See n.1, *supra*, for samples.

1 metadata file and image load file (*i.e.*, DAT and OPT files) should be provided in a self-identified
2 “Data” folder.

3 **I. Native Files.** Absent special circumstances, Audio/Video files, Excel files, .csv files,
4 and other files that cannot conveniently be produced as TIFF images should be produced in native
5 format (“Native Files”), unless they have redactions. Native Files should be provided in a self-
6 identified “Natives” directory. Each Native File should be produced with a corresponding single-
7 page TIFF placeholder image, which will contain language indicating that the document is being
8 produced as a Native File. Native Files should be named with the beginning Bates number that is
9 assigned to that specific record in the production (e.g., “DOC_0000000”). If a document produced
10 as a Native File is confidential, the suffix “_CONFIDENTIAL” shall be added to the Native Files
11 name (e.g., “DOC_0000000_CONFIDENTIAL”). A “NativeLink” entry for each spreadsheet
12 should be included in the .DAT load file indicating the relative file path to each native file on the
13 production media. Native Files should be produced with extracted text and applicable metadata
14 fields as set forth in Appendix A. Redacted documents may be produced with TIFF image files and
15 OCR in lieu of a Native File, TIFF placeholder image and extracted text file. Any metadata fields
16 for redacted documents that would reveal privileged information shall be excluded. Each producing
17 party will make reasonable efforts to ensure that its discovery vendor, before conversion to TIFF,
18 reveals hidden data from redacted Native Files that are produced as TIFF image files and will be
19 formatted so as to be readable. (For example, column widths should be formatted so that numbers
20 do not appear as “#####”). The producing party shall exercise reasonable, good faith efforts to
21 maintain all collected Native Files that may be relevant in a manner that does not materially alter or
22 modify the file or the metadata other than as provided.

23 **J. Structured Data.** To the extent responding to a discovery request requires
24 production of ESI contained in a database, the producing party may query the database for
25 discoverable information and generate and produce a report in a reasonably usable and exportable
26 electronic format (for example, in Excel or .csv format). The first line of each such file will, to the
27 extent possible, show the column headers for each field of data included. The parties shall meet and
28

1 confer to finalize the appropriate data extraction and production format for specific information
2 contained in a database. Upon review of the reports, the requesting party may make reasonable
3 requests for additional information to explain the database scheme, codes, and abbreviations or to
4 request reports in different formats. In the event that a requesting party believes the reports provided
5 are inadequate or otherwise insufficient, the parties agree to meet and confer about the production of
6 additional or alternative information or reports, including potentially native database information.
7 The foregoing is without prejudice to any Parties' right to request on-site access to any ESI database,
8 including the SAP and RAP systems referenced in Plaintiffs' Complaint (Dkt. No. 1, at ¶¶ 50, 107
9 and 171).

10 **K. Requests for Other Native Files.** Other than as specifically set forth above, a
11 producing party need not produce documents in native format. If good cause exists for the receiving
12 party to request production of certain documents in native format, the receiving party may request
13 production in native format by providing (1) a list of the Bates numbers of documents it requests
14 to be produced in native format, and (2) an explanation of the need for reviewing such documents
15 in native format. The producing party shall not unreasonably deny such requests. Each document
16 produced in response to such requests shall be produced with a "NativeLink" entry in the .DAT load
17 file indicating the relative file path to each Native File on the production media and all extracted text
18 and applicable metadata fields set forth in Appendix A.

19 **L. Confidentiality Designations.** If a party reduces Native Files or other ESI designated
20 "CONFIDENTIAL," "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" or otherwise
21 pursuant to the operative protective order, to hard-copy form, it shall mark the hard copy with the
22 appropriate designation.

23 **M. Color.** Documents containing color need not be produced in color in the first
24 instance. If good cause exists for the receiving party to request production of certain documents in
25 color, the receiving party may request production of such documents in color. The producing party
26 shall not unreasonably deny such requests.

27

28

1 **IV. PROCESSING OF THIRD-PARTY DOCUMENTS**

2 A. A party that issues a non-party subpoena (“Issuing Party”) may include a copy of this
3 Stipulation with the subpoena and request that the non-party produce documents in accordance with
4 the specifications set forth herein.

5 B. The Issuing Party is responsible for producing any documents obtained pursuant to a
6 subpoena to all other parties but may produce them in the same form as received.

7 C. Nothing in this stipulation is intended to or should be interpreted as narrowing,
8 expanding, or otherwise affecting the rights of the parties or any third parties to object to a subpoena.

9 **V. PRIVILEGE LOGS**

10 A. For all documents withheld on the basis of privilege, the parties agree to furnish logs
11 which comply with the legal requirements under federal law, but at a minimum will include the
12 following information:

- 13 1. A unique number for each entry on the log.
- 14 2. The date of document. For emails this should be the sent date of the document
15 and for loose ESI this should be the last-modified or create date of the
16 document.
- 17 3. The Author of the document. For emails this should be populated with the
18 metadata extracted from the “Email From” field associated with the file. For
19 loose ESI, this should be populated with the metadata extracted from the
20 “Author” field; if such field contains generic information such as the company
21 name, a party may substitute the information contained in the “Custodian”
22 metadata field.
- 23 4. Recipient(s) of the document where reasonably ascertainable. For emails this
24 should be populated with the metadata extracted from the “Email To” field
25 associated with the file. Separate columns should be included for the metadata
26 extracted from the “Email CC” and “Email BCC” fields, where populated.
- 27 5. A description of why privilege is being asserted over the document. This

1 description should include information sufficient to identify if the document
2 contained attachments over which privilege is also being asserted.

3 6. The type of privilege being asserted: (a) AC for Attorney/Client, (b) WP for
4 Attorney Work Product, (c) CI for Common Interest.

5 B. The parties shall identify on their logs where counsel is present in conversation,
6 specifically for columns 1(c) and (d) noted above. Where counsel creating the privilege is not readily
7 ascertainable from columns 1(c) and (d) above, the parties shall include a reference to counsel in the
8 privilege description field described in 1(e) above.

9 C. Privilege logs shall be produced within thirty (30) days of each production.
10 Regardless of the date of the close of fact discovery, the receiving party shall have thirty (30) days
11 from the date of receipt of any privilege log to review and register complaints about said logs. If a
12 producing party produces custodial documents for a deposition that will take place within 30 days of
13 the production date, the parties agree to meet and confer in good faith to provide the receiving party
14 with a privilege log for such documents prior to the related deposition.

15 **VI. REDACTION LOGS**

16 A. For each document that is redacted, in addition to providing the redacted version of
17 the document, the parties agree to furnish logs which comply with the legal requirements under
18 Federal Law, but at a minimum will include the following information:

- 19 1. The Begin Production ID of the document.
- 20 2. The End Production ID of the document.
- 21 3. A description of why privilege is being asserted over the document, or some
22 other explanation as to why the document was redacted, such as "Not
23 Responsive to RFPs".
- 24 4. If the document was redacted for privilege concerns, the type of privilege
25 being asserted: (a) AC for Attorney/Client, (b) WP for Attorney Work
26 Product, (c) CI for Common Interest.

27 B. Redaction logs may be produced on a rolling basis or after all productions are
28

1 complete, but prior to the close of discovery. If the log(s) are produced after all productions are
2 complete, the receiving party shall have thirty (30) days from the date of receipt to review and register
3 complaints about said log(s), regardless of the date of the close of fact discovery.

4 **VII. EXCEPTION TO LOGGING - POST FILING DATE PRIVILEGE DOCS**

5 Communications involving inside or outside counsel for the parties related to this case that
6 were created on or after October 16, 2017 need not be included in the parties privilege log(s) as a
7 matter of course. These exceptions are made without prejudice to any party's ability and right to
8 assert that such materials are discoverable and not privileged or protected. These exceptions also do
9 not apply to the redacted documents and their respective redaction log(s).

10 **VIII. INADVERTENT PRODUCTION OF PRIVILEGED INFORMATION.**

11 Pursuant to Federal Rule of Evidence 502(d), the inadvertent production of privileged or
12 work product protected data is not a waiver in the pending case or in any other federal or state
13 proceeding. The receiving party shall not use produced data that the producing party asserts is
14 attorney-client privileged or work product protected to challenge the privilege or protection. The
15 mere production of privileged information in a litigation as part of a mass production shall not itself
16 constitute a waiver for any purpose.

17 In addition, the inadvertent production of any privileged document, information or thing shall
18 not be deemed a waiver of such privilege or otherwise affect the producing party's right to seek
19 return or destruction of the inadvertently produced document, information, or thing. The party
20 receiving the document(s) that appears to be privileged shall promptly notify the producing party
21 upon becoming aware that the document(s) may have been inadvertently produced and in any event,
22 before making use of said document.

23 In the event that documents which are claimed to be privileged or subject to the work-product
24 doctrine are inadvertently produced, such documents shall be destroyed or returned by the receiving
25 party within two (2) calendar days of any written request therefore. The receiving party shall return
26 or destroy all copies of the inadvertently produced document(s) and not retain any copies, notes, or
27 summaries of said documents. If the receiving party seeks to challenge the privileged nature of the
28

1 document(s), the receiving party must still destroy or return the document(s) to the producing party
2 but may then seek re-production of the document(s).

3 It is the desire, intention, and mutual understanding of the parties that all inadvertently or
4 unintentionally disclosed or produced privileged information shall be treated as confidential and may
5 not be disclosed by the receiving party to persons or entities other than the producing party without
6 the written consent of the producing party.

7 If a party who received documents or information over which a privilege is asserted has
8 disclosed such documents or information to any person or in any circumstance, the party must
9 immediately: (a) notify, in writing, the producing party of the disclosure; (b) use best efforts to
10 retrieve or confirm destruction of all copies of the documents or information over which the privilege
11 is asserted; and (c) notify, in writing, the producing party regarding whether all copies have been
12 retrieved or destroyed.

13 The parties further agree that no motion to compel or other argument for waiver of privilege
14 will be raised based upon the inadvertent or unintentional production or disclosure of privileged
15 information.

16 Nothing herein shall prevent the receiving party from challenging the propriety of the claim
17 of attorney client privilege, work product protections or other applicable privilege or immunity
18 designation by submitting a written challenge to the court. The receiving party, however, may not
19 disclose the contents of a challenged document in such a written challenge to the court.

20 **IX. MISCELLANEOUS PROVISIONS**

21 A. Nothing in this protocol shall be interpreted to require disclosure of information
22 protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege
23 or immunity. The parties do not waive any objections as to the production, discoverability,
24 admissibility, or confidentiality of documents and ESI.

25 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.
26
27
28

1 Dated: March 15, 2019

Respectfully submitted,

2
3 QUINN EMANUEL URQUHART & SULLIVAN, LLP

4 By:/s/ *David Eiseman* _____

5 David Eiseman
Charlie K. Verhoeven
Sam Stake

6 QUINN EMANUEL URQUHART & SULLIVAN, LLP
7 50 California Street, 22nd Floor
San Francisco, California 94111
(415) 875-6600
(415) 875-6700 (facsimile)

8
9 Lance Yang
10 865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
(213) 443 3000
(213) 443 3100 (facsimile)

11
12 *Attorneys for Plaintiff Keyssa, Inc.*

13 Dated: March 15, 2019

14 Respectfully submitted,

15 KEKER, VAN NEST & PETERS LLP

16 By:/s/ *Ryan K. Wong* _____

17 Robert A. Van Nest
18 Leo L. Lam
Daniel Purcell
Matthew M. Werdegar
Ryan K. Wong
Christina Lee

19 KEKER, VAN NEST & PETERS LLP
20 633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

21
22 *Attorneys for Defendant Essential Products, Inc.*

23
24
25
26
27
28

ATTESTATION

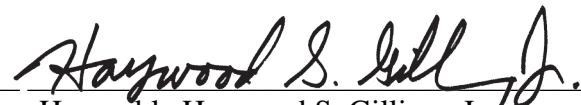
Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 15, 2019

/s/ David Eiseman
David Eiseman

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2
3

DATED: 3/18/2019



Honorable Haywood S. Gilliam, Jr.

United States District Judge

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
APPENDIX A

3 Field	4 Description
5 BegBates	6 Page ID of first page in a document.
7 EndBates	8 Page ID of last page in a document.
9 BegAttach	10 BegBates of parent record.
11 EndAttach	12 Page ID of last page in a document family
13 Custodian	14 Textual value of custodian.
15 CustodianOther	16 Textual value of all custodians who contained a duplicate copy of the record.
17 DateSent	18 Sent date of an e-mail message (Format: MM/DD/YYYY).
19 TimeSent	20 Time the e-mail message was sent.
21 DateReceived	22 Received Date of an e-mail message (format: MM/DD/YYYY)
23 TimeReceived	24 Time the e-mail message was received.
25 EmailSubject	26 Subject of the e-mail message.
27 From	28 Author of the e-mail message.
29 To	30 Main recipient(s) of the e-mail message.
31 CC	32 Recipient(s) of "Carbon Copies" of the e-mail message.
33 BCC	34 Recipient(s) of "Blind Carbon Copies" of the e-mail message.
35 ConversationIndex	36 The conversation index extract from the produced email message where available.
37 DateCreated	38 Creation date of the electronic file.
39 TimeCreated	40 Creation time of the electronic file.
41 DateLastMod	42 Date the electronic file was last modified.
43 TimeLastMod	44 Time the electronic file was last modified.
45 Author	46 Author field value pulled from metadata of the electronic file.
47 LastAuthor	48 LastAuthor field value pulled from metadata of the electronic file.
49 Title	50 Title field value extracted from the metadata of the electronic file.
51 Filename	52 Original filename of the electronic file. Contains subject of e-mail message for e-mail records.
53 FileExtension	54 File extension or other description of the email/electronic file type.
55 File Path	56 Logical file path that shows where original file was stored.
57 Filesize	58 Size of native file, in bytes.
59 MD5Hash	60 MD5 hash-128-bit output.
61 PgCount	62 Number of pages in a document.

Field	Description
NativeLink	Logical file path to the file produced in native format
TextLink	Path to the associated multi-page/document level text file for each produced document.
ProdVolume	The production volume associated with the produced file.
Confidentiality	The confidential designation given to the document